



**Exhibit A**



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**New Parent World, LLC v. True to Life Prods., Inc. et al., 3:23-cv-08089 - Rule 68 Offer of Judgment**

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**From** Aaron K. Haar <akh@jaburgwilk.com>

**Date** Tue 12/17/2024 6:44 PM

**To** Krystle Delgado, Esq <krystle@delgadoentertainmentlaw.com>; Tremain (Delgado Entertainment Law PLLC) <admin@delgadoentertainmentlaw.com>

**Cc** Maria Crimi Speth <mcs@jaburgwilk.com>

 1 attachment (311 KB)

2024.12.17. Offer of Judgment - Heritage House.pdf;

Krystle:


Please see attached Rule 68 offer of judgment in the New Parent World matter.

Thank you,



**Aaron K. Haar**

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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

New Parent World, LLC, a New Jersey  
for-profit corporation (d/b/a My Baby  
Experts),

Plaintiff,

v.

True To Life Productions, Inc., an  
Arizona for-profit corporation; Heritage  
House '76, Incorporated, an Arizona for-  
profit corporation; Brandon Monahan, in  
his individual capacity,

Defendants.

Case No. 3:23-cv-08089-DGC

**OFFER OF JUDGMENT**

Pursuant to Rule 68, Fed. R. Civ. P., Defendants True to Life Productions, Inc., Heritage House '76, Incorporated, and Brandon Monahan hereby offer to allow judgment be taken against them by Plaintiff in this action in the amount of \$200,000.00 *inclusive* of all damages, costs, attorney fees, and interest, if any, sought in this action. This Offer of Judgment is made for the purposes specified in Rule 68 and is not to be construed either as an admission that Defendants are liable in this action or that Plaintiff suffered any damages.

In addition to the monetary judgment, if this offer is accepted, Defendants will, to the extent they have not already done so, remove any infringing content from any website over which they have control. Defendants are willing to enter into an agreement whereby

Plaintiff may give notice of any content that it believes is infringing, and if within Defendants control, Defendants will remove such content within 10 days or provide notice that such content is not infringing. Defendants are willing to settle disagreements as to whether specific content is infringing by an expedited arbitration procedure whereby a mutually agreed upon arbitrator determines whether the content infringes.

If this offer is not accepted and the judgment Plaintiff finally obtains is not more favorable than the unaccepted offer, Plaintiff must pay Defendants' costs incurred after the date this offer is made. Pursuant to Rule 68, this Offer of Judgment is withdrawn if not accepted within 14 days.

DATED this 17th day of December, 2024.

**Jaburg & Wilk, P.C.**

/s/Aaron K. Haar

Maria Crimi Speth

Aaron K. Haar

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*Attorneys for Defendants*

**COPY** of the foregoing  
mailed and emailed this  
7th day of June, 2024, to:

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